

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)The outer premises located at 3238 Goshen Run Rd.,
Chesterhill, Ohio, 43728, including curtilage.Case No. 2:22-mj-035

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A INCORPORATED HEREIN BY REFERENCE

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

SEE ATTACHMENT B INCORPORATED HEREIN BY REFERENCE

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

18 USC Section 922(a)(1)(A)
 18 USC Section 922(p)

Engaging in the Firearms Business without a license.
 Knowingly Manufacture/Possession of Firearm Designed to Avoid Detection

The application is based on these facts:

SEE ATTACHED AFFIDAVIT INCORPORATED HEREIN BY REFERENCE

- ☒ Continued on the attached sheet.
☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Aaron Green, ATF SA

Printed name and title

AND ATTESTED TO BY FACETING @ F.R.-Cr. P. 4.1.
 Sworn to before me and signed in my presence.

Date: APRIL 1, 2022


 Norah McCann King
 United States Magistrate Judge

Judge's signature

City and state: Columbus, Ohio

NORAH MCCANN KING, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

IN THE MATTER OF THE SEARCH OF
The outer premises located at 3238 Goshen
Run Rd., Chesterhill, Ohio, 43728, including
curtilage.

Case No. 2:22-mj-0235

FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Aaron Green, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this Affidavit in support of an application for a search warrant under Federal Rule of Criminal Procedure 41 to authorize law enforcement to search the outer premises known as 3238 Goshen Run Rd., Chesterhill, Ohio, 43728, hereinafter referred to as the "SUBJECT PREMISES," further described in Attachment A, for the items described in Attachment B.

2. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been since November 2017. I am a graduate of the ATF National Academy Special Agent Basic Training Program and the Federal Law Enforcement Training Center, Criminal Investigator Training Program. I was a member of the Federal Air Marshal Service, with the Department of Homeland Security, from December 2010 to July 2016 and graduate of the Federal Law Enforcement Training Center, Federal Air Marshal Training Program. I worked as a patrol officer for the Columbus Police Department in Columbus, Ohio from December 2000 to December 2010, and from April 1998 to December

2000, I was employed as a patrol officer for the Suffolk Police Department in Suffolk, Virginia. As a result of my training and experience as an ATF Special Agent, I am familiar with federal criminal laws pertaining to firearms violations. As an ATF Special Agent, I am also authorized to carry firearms, execute warrants, make arrests for the offenses against the United States, and perform other such duties as authorized by law.

3. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this Affidavit, there is probable cause to believe that violations of Title 18, United States Code, Sections 922(a)(1)(A) (engaging in the Firearms Business without a license) and 922(p) (Knowingly Manufacture/Possession of Firearm Designed to Avoid Detection) have been committed by Thomas DEVELIN. There is also probable cause to search the SUBJECT PREMISES described in Attachment A for evidence, instrumentalities, and/or fruits of these crimes, as further described in Attachment B.

PROBABLE CAUSE

5. On or about March 2022, the Columbus Ohio Division of Police Counter Terrorism Unit initiated an investigation into Discord messages provided by the Ohio Statewide Terrorism and Analysis Center and Ohio Army National Guard. Based upon the screenshots which date back to approximately October 2021, and a follow-up investigation, members of the group are largely part of the Ohio Army National Guard and use the Discord chat group

#degeneracy to speak with each other. The individuals later identified as Thomas DEVELIN and James MEADE are suspected to be major contributors to the messages.

6. An examination of the screenshots displayed a large quantity of anti-Semitic, white nationalist, racist, and misogynistic content which, investigators were able to identify the material as being consistent with that of racially motivated violent extremist and incel violent extremist content.

7. The user articulated to be DEVELIN posted the following messages (not all inclusive):

- a. "I'm at a Jewish school and I'm about to make it everyone's problem." Shortly after stating, "The playground is about to turn into a self-defense situation." In the context of the group chat, a "self-defense situation" is clearly referenced multiple times and is meant to be a reference to being involved in a shooting. He also stated, "Simultaneously I will shoot the next parent dropping their kid off at the school. Really need to get on their radar at the ATF that we aren't fucking around." Accompanied with these posts was a photo depicting a Glock handgun on his lap.**
- b. While inside a synagogue, the user posted a photo of the structure claiming, "6 million wasn't enough."**
- c. Another post stated, "we're about to hunt niggers on night patrol in Columbus. Someone's gotta work the beat and hold the line."**
- d. "I've become so radicalized against women that I've forgotten how to act rationally around them when one of them decides it's a good idea to speak to me."**

- e. "It's all the same charge after the first felony I realized that after I didn't feel like turning my bump stock in."
- f. "Ight, time to turn wright pat airbase into Fort hood in 2009."
- g. "If the military actually ever decides to crack down on extremists, they're going to have to kick at least half of us out"
- h. The user also posted a photo of a 3D printed Glock and attempted to sell it for \$400.

8. The users articulated to be DEVELIN and MEADE also had multiple discussions about committing violent acts together:

- a. Both users discuss traveling to John Glenn airport and MEADE states he would go to any towers that happen to be close together. DEVELIN suggests the brewery off of 270 which is a Budweiser manufacturing facility. DEVELIN posts pictures of the facility and MEADE replies that he, "Hope they got a terrorism insurance plan the day before. My elven overlords bid me to destroy the tower."
- b. DEVELIN and MEADE are discussing the possibility about getting some of DEVELIN's guns back from the Morgan County Sheriff's Office. DEVELIN posts a photo displaying the application of war paint for when he goes down and MEADE replies with, "No survivors". The conversation further states details that a deputy's entire family should be killed, and the corpses should be hung for all to see.

9. To add to the validity of these statements, DEVELIN and MEADE were known to be employed by Sahara Global Security in addition to their status as current and former members of the Ohio National Guard. Sahara Global is a private security company

which often provides armed security to various Jewish facilities throughout the Columbus area. The CEO of the company was interviewed and confirmed that DEVELIN has predominately worked at the religious locations and identified the Glock 19X posted by DEVELIN in the Jewish school threat as belonging to DEVELIN.

10. On March 31, 2022, Investigators executed State of Ohio search and arrest warrants at the residence of DEVELIN, located at 2141 Brentwood Circle, Apt 3B, Columbus, Ohio, 43235. DEVELIN was located inside and taken into custody. Upon a search of the residence, multiple firearms were discovered, along with a 3D printer known to investigators as a "Ghost Gun" printer. From my training and experience, I know that "ghost guns" are untraceable homemade weapons made in whole or in part with a 3D printer. Investigators also discovered multiple firearms manufacturing materials inside the residence.

11. While in custody, Your Affiant interviewed DEVELIN who had previously been Mirandized and agreed to speak with Your Affiant. The following is a synopsis of the video recorded interview:

- a. DEVELIN stated that he began making Ghost Guns around 2020 with the intent to sell them for profit. DEVELIN conducted the research online and purchased the 3D printer in order to manufacture the Ghost Guns to sell to people he knew. DEVELIN states that he did not advertise them on any online sources, and he was still in possession of at least four (4) of the eight (8) or so that he manufactured.
- b. DEVELIN stated that on Monday, March 28, 2022, he knew law enforcement may be coming for him and he went to the residence/cabin of MEADE, located at 3220 Goshen Run Rd., Chesterhill, Ohio, 43728, to hide multiple Ghost Guns, a Bump Stock, an unfinished firearm frame, and a Military Improvised Explosive

Devices (IED) instruction manual. DEVELIN placed them in a tote and hid them in the tree line on the property under a blanket, which DEVELIN pointed to on a map provided by SA Green. DEVELIN stated the cabin belonged to MEADE's family and that MEADE was also present at the residence when he arrived and was aware of the items that were placed on his property.

- c. On Tuesday, March 29, 2022, DEVELIN states that he returned to MEADE's residence to burn other illegal firearms parts in a firepit, located on MEADE's property. DEVELIN stated he burned the items because he did not want to have them in his possession.
- d. DEVELIN also stated that he manufactured and sold 6 "lowers" that he knew were illegal to an unknown individual he met through a mutual acquaintance.
- e. DEVELIN acknowledged that he was one of the people on the Discord chat group that that he had been in additional chats relating to firearms manufacturing and that he was not proud of the things he wrote in the chat. DEVELIN also voluntarily wrote down multiple online sites where he obtained firearms/Ghost Gun information that would be found on his cell phone and computer.

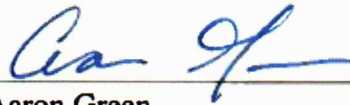
ADDITIONAL TIES TO THE SUBJECT PREMISES

11. Records from the Morgan County Auditor's Office show that the listed owners of the SUBJECT PREMISES are Green Betty J Tod and James Ricky Meade. Records from the Morgan County Auditor's Office do not list any property with the address 3220 Goshen Run Rd., the address provided by DEVELIN. It appears that the cabin bearing the address 3220 Goshen Run Rd. may be on a property with the legal address 3238 Goshen Run Rd.

CONCLUSION

12. Based on the totality of the facts and circumstances described above, Your Affiant respectfully submits that probable cause exists that Thomas DEVELIN committed violations of 18 U.S.C. §§ 922(a)(1)(A) and 922(p). Furthermore, Your Affiant respectfully submits that probable cause exists that evidence of 18 U.S.C. § 922(a)(1)(A) and 18 U.S.C. § 922(p), including items listed in Attachment B, will be found at the SUBJECT PREMISES.

Respectfully submitted,



Aaron Green
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Subscribed and sworn to before me on ATTESTED to By FACE TIME @ P.R.C. - A. 4.1
APRIL 1, 2022


Norah McCann King
United States Magistrate Judge



NORAH McCANN KING
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Places To Be Searched

The place to be searched is the outside of the residence and curtilage located at 3238 Goshen Run Rd., Chesterhill, Ohio, 43728.

ATTACHMENT B

Particular Items to Be Seized

1. Firearms and ammunition, as evidence related to potential violation(s) of 18 U.S.C. § 922(a)(1)(A) and 18 U.S.C. § 922(p).
2. Firearm parts, accessories, and items commonly used or associated with the possession of firearms, including conversion devices, ammunition, firearm magazines, and holsters.
3. Documents related to improvised explosive devices and firearms manufacturing.